# DBENEWS

**Published by the Idaho Transportation Department** 

March 2008 Volume XVII No. 6



Where in Idaho is this? See page 2

#### What is a DBE?

A DBE is a small, for-profit business concern that is at least 51% owned and controlled by socially and economically disadvantaged individuals. The US Department of Transportation's DBE Program is designed to foster equal opportunity for minority, female and disadvantaged business owners on federal-aid transportation projects, and for helping them improve their business efficiency and flexibility.

This monthly newsletter is published by the ITD's DBE Supportive Services as an informational and educational resource for DBEs, contractors, consultants and federal-aid agencies on EEO, procurement and business issues. If you'd like to receive this newsletter regularly, please contact us for a free subscription.

#### — Liz Healas, Editor



## It Ain't Necessarily Over When It's Over

Finding out what went wrong on unsuccessful bids & proposals

You submit a bid or proposal on a project. And then you hear nothing. Obviously, the bid or proposal was not successful. What should you do now?

Unfortunately, many contractors and consultants tend to do nothing. They shy away from the whole episode like it was a bad date, never to be spoken of again.

But this isn't dating – this is business.

Asking for feedback from a prime contractor or consultant on your bid/proposal won't end up with you being slapped with a "No Contact" order (unless you have an exceptionally confrontational method of following up with people).

This is your chance to learn something valuable. Use it.

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## Lizapalooza continues to tour through March

Learn about doing business with the government, DBE, 8(a) and HUB-Zone Certifications, and all kinds of other good stuff

For those of you who have never attended **Lizapalooza**, this is a series of statewide half-day orientations where firms can learn about selling to state and federal government.

This is your chance to find out about

(Continued on page 5)

Inside ... New DBEs ... April Training Calendar ... 2008 Idaho
Legislature ... BUSTED! Tales from the OIG ... EEO/Affirmative Action
Requirements Workshops ... March Crossword ... TD Procurement Info

## DBE Supportive Services

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Office Location & Mailing Address:

3311 W. State Street, Room 300B / PO Box 7129, Boise, ID 83707

(Office Hours are 8am - Noon, 1pm - 5pm, Mountain Time)

#### Welcome New DBEs!

#### Sierra Infosys Inc.

Raghunathan Kumar, President

6001 Savoy Drive, Suite 210, Houston, TX 77036

Phone: (713) 747-9693 FAX: (713) 222-2434

Email: senthil@sierratec.com Homepage: www.sierratec.com

Software Consulting

#### Write Rhetoric

Danica Rhoades, Owner

1047 S. Dale #101, Boise, ID 83706

Phone: (208) 866-1692

Email: write.rhetoric@gmail.com Homepage: writerhetoric.com

Editing and writing services for individuals and companies.

To see our complete **DBE Directory**, visit on-line at **www.itd.idaho.gov/civil/ dbeforms.htm.** This listing is updated to our website on the first workday of every month.

Hard copy versions of the directory, updated each quarter, are also available by request.

### SCORE looking for bilingual volunteers

The Service Corps of Retired Executives (SCORE), Counselors to America's Small Businesses, is seeking vol-



In particular it is interested in attracting bilingual, Spanish-speaking, candidates.

unteers to join its counseling group.

SCORE is a not-for-profit organization

that provides:

- · Face-to-face counseling at no cost
- Mentoring for existing businesses
- Workshops covering business fundamentals

SCORE volunteers represent every facet of the business community. Some have worked as executives of large corporations, while others have been small business owners.

SCORE brings expertise from a wide range of business disciplines along with the time-tested experience of volunteers who have faced business challenges and opportunities.

The time commitment is typically counseling one day per month and attendance at a monthly two-hour chapter meeting.

If you are interested in helping entrepreneurs start a business or to serve as a mentor to existing businesses please contact SCORE staff at (208) 334-1696, Ext. 338 and gives them a chance to introduce you to SCORE.

Clue for this month's "Where in Idaho is this"? (front cover). Established as Idaho's only archaeological park in 1989, it was a wintering ground for Paiute Indians. You can find petroglyphs here dating back 12,000 years.



Answer to February Issue: Old Cataldo Mission, in Shoshone County.

## Events in April

Mon	Tue	Wed	Thu	Fri	Sat
	1 The Wisdom Factor: 21 Free & Cheap Mar- keting Secrets Pocatello ISU Workforce Trg (208) 282-3372 www.workforcetraining.isu .edu	2 Networking for Success Post Falls NIC Workforce Trg (208) 666-8009 www.idahosbdc.org The Wisdom Factor: Growing Your Biz Preston ISU Workforce Trg (contact info left)	3	4 Starting a Biz in Idaho Post Falls NIC Workforce Trg (contact info left)	5
7 Building Better Work- place Relation- ships Pocatello ISU Workforce Trg (Contact info above right)	8 Branding Your Biz Pocatello ISU Workforce Trg (contact info above) Words That Work: Biz Writing Basics Boise SBSC (208) 472-5200 www.boisechamber.org/ smbusiness/ Biz Start-Up Boot Camp Twin Falls ISBDC 208- 732-6455 www.csi.edu/ isbdc/SBDC.html	9 Outsmarting Your Competition Post Falls NIC Workforce Trg (contact info above)	10 Small Biz Start- Up Pocatello ISBDC (208) 232-4921 www.idahosbdc.org Biz Basics Nampa Hispanic Cultural Center (208) 334-9004 ext 349	11 Trademarks & Copyrights - How to Protect Your Biz Identity Twin Falls ISBDC (208) 732-6455 www.csi.edu/support/ISBDC	12
14	15 How to Start Your Own Biz Ontario BizCenter (541) 881-8822 ext. 356 http:// commonspot.tvcc.cc/ Academics/BizCenter/	16 Planning for Biz Success Ponderay NIC Workforce Trg (contact info above) How to Properly Insure Your Biz Bear Lake ISU Workforce Trg (contact info above left)	17 Hiring for the 21st Century Preston ISU Workforce Trg (contact info above left)	18 Managing Your Biz Finances Like a Pro Post Falls NIC Workforce Trg (contact info above left) Greening Your Biz Boise META (208) 336-5533 ext. 230 www.metaidaho.org	19
21	22 Hiring for the 21st Century Pocatello ISU Workforce Trg (contact info above) Biz Start-Up Boot Camp Twin Falls ISBDC (Contact info above)	23 Confused about Biz Taxes? Twin Falls ISBDC (contact info above left)	24 Small Biz Forum Boise SBIF (208) 334-6032 www.iic.idaho.gov/education/sbif/sbif.htm	25	26
28	29	30	Having problems finding the right kind of training? Contact DBE Supportive Services. We're very good at hunting things down!		

### 2008 Idaho Legislature

Some of the bills having the potential to affect our DBEs. To see the full text of the bills (and their progress), visit www3.state.id.us/oasis/minidata.html.

#### HOUSE

H0350 Geologists, registration Amends and repeals existing law ...to provide that fees shall be paid ...to revise qualifications for applicants ...to revise provisions relating to the preparation of geologic papers and documents by a

subordinate employee ... to revise expiration, renewal and reinstatement of certificates of registration.

H0380 Engineers/land surveyor law revised Amends existing law ... to provide that a land surveyor must become duly licensed ... to provide that applications for licensure must show the applicant's technical experience ... to provide for the removal of the engineer intern's or land surveyor intern's name from the board's current list of certificate holders for failure to timely meet certificate renewal requirements ... to revise an administrative penalty; to provide for the enforcement of provisions relating to unlicensed practice, etc.

H0431 Small employer, tax incentive Amends existing law to revise the definition of "tax incentive criteria" in the Small Employer Incentive Act of 2005.

H0453 Real estate appraiser/examinatn fee Amends existing law to revise disciplinary proceeding provisions relating to licensed and certified real estate appraisers; and to revise fee provisions.

H475 Electrician, exam/license Amends



Idaho's legislature is temporarily housed here, in the old Ada County Courthouse, while the Statehouse is undergoing renovation.

the fee charged ... for certain licenses.

existing law relating to

electricians to revise

the requirements for

an apprentice electri-

cian to take the jour-

neyman's examination;

to revise the duration

of certain licenses; to

provide for the expira-

revise the time when

revived; and to revise

any license may be

tion of licenses; to

H0476 Public works contractor, licenses Amends existing law relating to public works contractors to provide for a Class Unlimited license; to provide for qualifications for a Class Unlimited license; to revise the qualifications for certain other classes of licenses; to provide that specified bids, with an exception, must not exceed the estimated cost or bid limit of the license held; to require that the aggregate total of bids include all bids of subcontractors; and to provide that subcontractors' bids must not be considered a separate item for the purpose of computing the bid on a public works project.

H0478 Plumbers, registration Amends existing law to revise the registration period and ... fee for plumber apprentices and specialty apprentices; to remove a requirement that apprentices and specialty apprentices register with the Idaho Plumbing Board; and to provide for registration of apprentices and specialty apprentices with the Div. of Building Safety.

H0479 HVAC, apprentice, registration Amends existing law to revise the registration fee and registration duration for heating, ventilation and air conditioning apprentices and specialty apprentices.

H0480 HVAC, codes, competency certificate Amends existing law relating to heating, ventilation and air conditioning systems to provide for revised code editions; to permit the Idaho Heating, Ventilation and Air Conditioning Board to adopt revisions and later editions of the code; to revise an exception to certificate of competency requirements; etc.

H0481 Plumbers, competency certificate Amends existing law relating to plumbing and plumbers to revise a definition; and to remove an exception to the certificate of competency requirements.

H0497 Public wrks contractor/hlth insurnc Amends existing law to provide that as a condition for licensure of public works contractors licenses, the licensee shall provide health insurance to each of its employees that is equivalent or superior to the coverage the state of Idaho provides for its employees; to provide that when applying for and renewing a license, the holder of the license shall show proof of insurance; and to provide that failure to maintain the required health insurance coverage for its employees shall subject the licensee to license suspension or revocation.

#### **SENATE**

S1393 Business interests, protection Adds to existing law relating to labor to provide for agreements and covenants to protect employers' legitimate business interests. (Non-compete)

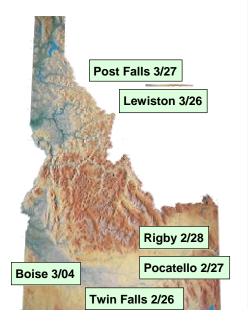
Forgotten who your Idaho legislators are? Visit www.legislature.idaho.gov/about/ districtmap.htm for a point-and-click map which will show your district's senators & representatives.

(LIZAPOOLZA, Continued from page 1) how to qualify and become certified as a disadvantaged business enterprise, and what kind of valuable benefits they can enjoy through DBE Supportive Services.

At the same time, firms learn about many other services and programs available to small businesses through other government agencies and organizations, including the Small Business Administration's 8 (a) and HUBZone Certifications, bidmatching through the Idaho Business Network, the "how to" of selling goods and services to the State of Idaho, and business counseling through the Idaho Small Business Development Center!

These orientations are not only helpful for businesses considering DBE or other types of certification, they are also informative for DBEs who would like new or additional information.

Attendance is free — you don't want to miss it! However, pre-registration is necessary. If we don't get the sign-ups, we'll cancel the location. Call or e-mail DBE Supportive Services today for a registration form, or visit www.itd.idaho.gov/civil/pdf/orientations.pdf.



#### Busted! Tales from the OIG

Four Kansas Construction Companies Agree to Pay Over \$800,000 to Settle Allegations of False Claims Under FHWA DBE Program

On January 2, 2008. AGW Steel, Inc. (AGW), **Koss Construction** Company, Inc. (Koss), Carter- Waters Corporation (CWC), and Ideker, Inc. (Ideker) agreed to a civil settlement in U.S. District Court in Wichita. Kansas, to resolve allegations of DBE fraud. AGW agreed to pay \$50,000; Ideker agreed to pay \$22,000; Koss agreed to pay \$600,000; and CWC agreed to pay \$176,000.



Another caper shut down by the Office of the Inspector General.

Koss, CWC, and Ideker also agreed to corporate integrity programs to be approved by the Federal Highway Administration (FHWA). AGW and its owners, Harvey and Geneal Williams, agreed to voluntarily withdraw from participation in the Federal DBE program for a period of 3 years.

The investigation revealed that Koss used AGW as a supplier on various federally funded construction projects valued at approximately \$54 million to help Koss meet the contractually mandated DBE goals. During the same period of time (2002), AGW inserted itself in the procurement process between CWC and Ideker, another prime contractor.

The Ideker scheme was identified by the Kansas Department of

Transportation (KDOT) and did not result in any loss to the U.S. Government. For participation in this pass-through scheme, AGW received approximately \$32,500. The Office of the Inspector General (OIG) investigated this case with assistance from FHWA and KDOT.

## SBA Teams with D&B to Provide Small Biz Owners with Credit Management Resources

Small business owners now have a new small business resource to help improve their chances for profitability by understanding the importance and use of business credit. The U.S. Small Business Administration (SBA) has launched a series of training resources designed to help small business owners manage their business credit.

The SBA and Dun & Bradstreet (D&B) have joined together in a nationwide partnership to give small business owners valuable step-by-step guidance on how to proactively manage their business credit. With the training resources, small business owners are advised to take the following five smart steps to

(Continued on page 10)

## How Can Microsoft Project Help My Business Succeed?

Why should you use MS Project when your current scheduling system works just fine? Here's why.

First, what is a project? It is a one-time event that has a defined scope, uses resources like people and materials, has a beginning and an end (unlike on-going business functions such as accounting or human resources). Some good examples of projects are:

- · Constructing a building
- Developing and testing a software package
- Designing and implementing a new training program for all employees.

The following are ways that Microsoft Project (MS Project) helps the Executive, the Project Manager, and the resources (workers) involved in the project track costs and progress using MS Project:

1. Scheduling Engine: This is the single most powerful aspect of MS Project. Unlike Excel (a spreadsheet) or Access (a database), MS Project's scheduling engine allows you to define a task's duration and its relationship to other tasks. Then, you establish a start date for the project, and MS Project calculates the dates the tasks need to occur in order to complete the project on schedule. The project manager will always make the final decisions and manage the human side of the project, but MS Project's ability to automatically manage the schedule dates makes managing the project much easier for everyone involved. If one date on the schedule changes, MS

#### **By Marilou Blair**

Marilou Blair is a Project Management Consultant and teaches Beginning, Intermediate, and Advanced MS Project for Boise State University, Department of Workforce Services in Nampa and Boise. She can be reached at (208) 468-0613. Project automatically reschedules all of the other tasks that are linked to it.

#### 2. Task Management:

MS Project stores detailed information about each task, when it is scheduled, whether it has a predecessor or successor, how much it's going to cost and resource breakdowns as to who is doing the task.

## 3. Resource Management: Resources (workers) are

usually the most expensive aspect of a project. Talent costs money. MS Project helps manage the resources attached to each task and allows you to assign different rates for different skills or jobs. You can see the effect of changes in pay rates or material costs, see if resources are over or underallocated, and sort them in several different ways. (One useful sort is most expensive to least expensive). MS Project also provides reports such as 'who does what when', allowing project managers, stakeholders, and resources to track what tasks are due when and who is responsible for their completion.

4. Notes: Putting notes on the schedule, next to the resource or task, allows everyone to see relevant information about a task or a resource that needs to be documented (updates, emergency time off, changes). Links to web sites and other documents can also be attached to tasks and resources.

- 5. Tracking: MS Project allows you to save multiple "baselines" (original or revised schedules) against which actual tasks and costs can be compared as the project progresses. This is a powerful tool for keeping your project on schedule and within budget.
- 6. Reports and Views: MS Project provides you with a variety of reports on costs as the project proceeds. You can track whether you are on target by having your actual resource and material costs compared to their budgets. MS Project will also calculate an "at complete" cost to keep the financial people happy.

These are just a few of the ways that MS Project can help to improve your project management. Whether you are scheduling software development, replacing a software package in house, constructing a building, or tackling any one-time project, MS Project can help you manage your scope, resources, costs and schedule more effectively.

A few other things to bear in mind when considering implementing MS Project:

- A software package itself is only one third of the project management equation. The other two critical elements that must be considered before implementing MS Project are processes and people. The basic management processes that make a business succeed must be predictable and repeatable.
   And you need to have personnel who are trained, motivated and committed to the success of the project management control system.
- You'll need a commitment of support from top management, and the business or project 'stakeholders'. When the tough decisions have to be made,

(Continued on page 7)

(MS PROJECT Continued from page 6) or priorities have to be rearranged, only unbending support from above will do.

You should select a 'pilot' group to implement the software on a small project first as a test before putting it into general use. This takes some planning and upfront work, but is worth it for a smooth implementation, much like any other new software installation. The period of change and transition are well worth the benefits derived from the cost and schedule information which are available in MS Project.

## MS Project Classes Coming Up in March

Microsoft Project Essentials Learn the basics of setting up and managing your project. Create a task list, set up resources, assign resources to tasks and format and print your project plan. Nampa (Canyon County BSU Campus)

3/10-12, 6-9pm, 6 hours, \$69

Microsoft Project Intermediate Learn to track progress and manage your project details. Fine tune task details, resources, assignments, and the project plan. Learn how to organize, sort, and format your project cost and resource information for your own use and for presentation.

Nampa (Canyon County BSU Campus) 3/17-19, 6-9pm, 6 hours, \$69

Microsoft Project Advanced Learn to share your project info with other programs, to apply advanced formatting, to customize Project, and to consolidate Projects and Resources. Learn more advanced tracking procedures. Nampa (Canyon County BSU Campus) 3/24-3/26, 6-9pm, 6 hours \$69 Boise BSU Campus 3/04-3/06, 6-9pm, 6 hours, \$69

To register for classes and receive directions to class location either call (208)426-1974 or go to <a href="https://">https://</a> cwtreg.boisestate.edu and go to computers and business section to locate classes and register.

## US Department of Transportation & US Department of Labor **EEO/Affirmative Action Requirements**

Construction Season is fast approaching — you can't afford to miss these workshops!

In order to assist companies who are required to fulfill civil rights requirements on federal-aid contracts/subcontracts in the amount of \$10,000 or more, the Idaho Transportation Department's EEO Office will be sponsoring training sessions at three locations in February and March.

The training sessions are provided FREE OF CHARGE, and will cover information regarding US Department of Labor and US Department of Transportation EEO, Affirmative Action and Veteran requirements on federal-aid projects. In those areas where it is applicable, information on Tribal Employment Rights will be provided. Information will also be presented on the services provided by the Community Council of Idaho and other organizations within the local area of the training. Includes update

on Shoshone-

Bannock TERO

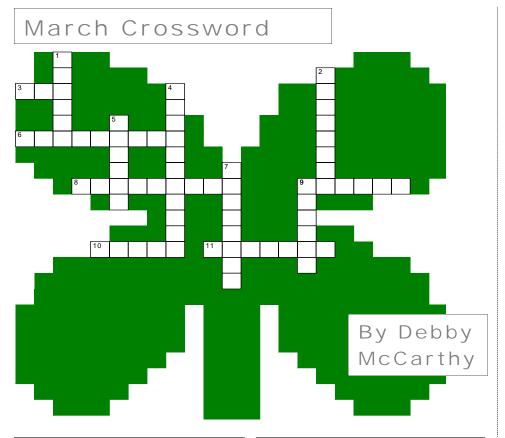
Requirements

#### This year's sessions will split into two segments:

**Construction Companies from 8:00am to Noon** Consultant Companies from 1:00pm -5:00pm

Consultant firms are now being reviewed! If you're a **Boise** consultant working March 6 on ITD agreements, and you're chosen, 8:00 am to 5:00 pm do you know what ITD, District 3 8150 Chinden to expect?

To register or for more information about the workshops, please contact Julie Caldwell at (208) 334-8458 / julie.caldwell@itd.idaho.gov or **Debby McCarthy /** debby.mcarthy@itd.idaho.gov at (208) 334-4442. To download the registration flier, visit www.itd.idaho.gov/civil/external.htm.



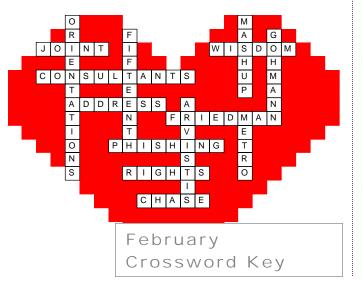
Across BRADSTREET PARTNER

- 6. POST BID HELP
- 8. H0431
- 9. PROJECTS E-MAILS
- 10. SCORE C
- 11. MICROSOFT TEACHER

Down STATE INVESTIGATORS

- 2. SIERRA'S FOCUS
- 4. AFTERNOON PARTICIPANTS
- 5. NEW WRITER
- 7. AFTER BID CORRESPONDENCE
- 9. TRAINING FACTOR

Remember! The first subscriber who submits complete and correct answers to the crossword wins



(FEEDBACK, Continued from page 1)

Ask the contractor/consultant: What didn't I get right? What were you looking for that I couldn't provide (or overlooked)? As a small firm, how can I custom-tailor my proposals to compete with the more generic proposals of the big firms? In other words, how can we do business together in the future?

In many cases, the prime contractor, consultant or purchasing officer might have thought you made a pretty good effort. But it's not their job to pick up the phone and give you encouragement and feedback.

That's *your* responsibility, if you're really hungry for the work. This is also a marketing opportunity, a part of the ongoing process of building all-important personal relationships with people who can give you work.

Getting follow-up works both ways. If your bid or proposal was successful, be sure to find out *why* it was successful. You may have the makings of a winning formula!

### Other Post-Letting Tips

On state, federal or other government projects, contractors naturally should take a look at the project's bid abstracts to see their competitors' numbers. ITD's are posted at www.itd.idaho.gov/design/contractors/br.htm.

Consultants will want to get a copy of their successful competitor's final agreement — not to copy or imitate, but to study and dissect. Except for trade secrets or other proprietary information, these government agency documents are public record.

Remember, too, when dealing directly with an agency, you can ask for a debriefing with the purchasing officer.

Not all of ITD's projects open for bid are directly highway-related. Check out www.itd.idaho.gov/business/business.htm (Bid &

## Contract Information—ITD Goods & Services)

for bid openings on maintenance buildings, rest areas, sand sheds, mowing, and other services posted by ITD's Purchasing Section. And here's the great part: these notices now are hyperlinked to their plans and specifications!

### Don't See Any DBE Goals On ITD Projects?

## That's because we aren't setting individual DBE project goals at this time!

As we discussed in past issues of The DBE News, a 2005 Ninth Circuit Court of Appeals decision (Western States Paving Co. v. State of Washington Dept. of Transportation) has prompted all states affected by this ruling to pursue their DBE goals through race/gender-neutral means until they have the results of a disparity study. Keep watching this newsletter for further developments.

## Looking for the Non-ITD Projects Listings?

They're only available to our DBEs through **weekly e-mails**. (Much faster & more timely!) If you're a DBE and would like to receive these, please contact us so we can add you to our distribution list.

## ITD HIGHWAY CONSTRUCTION PROJECTS

For the quickest, most complete notification of these projects as they are put out for bid, visit ITD's Contractor Information Page at:

## www.itd.idaho.gov/design/contractors/contrinfo.htm

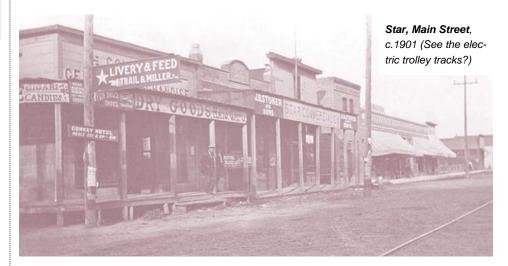
This excellent resource features *Notice* to *Contractors*, which alerts you to all upcoming federal-aid and state highway construction projects let through ITD, and list specific details and quantities, the

names of resident engineers, and a brief description of the work to be performed.

Also included is: Quarterly Bidding Forecast, Planholder Lists (updated daily), Bid Result and Bid Abstract Information, and Contract Award Information.

Please note: Starting in 2008, *Notice to Contractors* is available **online only**.

They are no longer mailed.



### Free Non-Bidder's Plans & Specs For DBEs

Idaho-Certified DBEs: remember to call DBE Supportive Services at (208) 334-4442 for free non-bidder's ITD Plans & Specifications if interested in bidding as a subcontractor. Limit of ONE set of plans per project per DBE firm. A DBE Non-Bidders Plan Holders list can be found at <a href="https://www.itd.idaho.gov/civil/planholders.htm">www.itd.idaho.gov/civil/planholders.htm</a>

Project			
\-\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	District 1	Coeur d'Alene	(208) 772-1200
1	District 2	Lewiston	(208) 799-5090
h-51	District 3	Boise	(208) 334-8300
} ( m)	District 4	Shoshone	(208) 886-7800
1	District 5	Pocatello	(208) 239-3300
) }	District 6	Rigby	(208) 745-7781

(SBA-D&B, Continued from page 5) establish and maintain a positive business credit file:

Step 1: Start a business credit file
To establish business credit, business
owners may need to obtain a D-U-NS® Number, a unique business identification number, to begin to establish
a credit file as soon as they start their
business.

Step 2: Establish a credit history
Business owners should put all expenses in their business name and
use a commercial bank account to
pay bills, rather than using personal
funds. This approach will allow business owners to build a history of payment behavior that will help establish
favorable credit terms.

Step 3: Pay bills on time Commercial credit scores are influenced by paying bills on time as well as other factors, such as outstanding debts

Idaho Transportation Department EEO Office—DBE Supportive Services PO Box 7129 Boise, ID 83707-1129 and company revenues.

Step 4: Monitor & understand business credit file Business owners should monitor their credit file before any change occurs that might affect relationships with suppliers, customers and banks.

Step 5: Monitor customer & supplier credit Business owners can improve cash flow by knowing the credit standing of business partners before agreeing to payment terms.

The training resources include an online webinar, CD-ROMs, informational brochures and other resources on how to properly establish and protect business credit. Resources and information are available at www.sba.gov. The resources are currently available in English, with Spanish translations becoming available in mid-2008.

#### ITD & TITLE VI

The Idaho Transportation Department (ITD) is committed to compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and directives. ITD assures that no person shall on the grounds of race, color, national origin, gender, age, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any ITD service, program, or activity. The department also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies, and activities on minority and low-income populations. In addition, the department will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency.

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